

EXHIBIT D

EXHIBIT D

Don Bennion

From: Planet Depos Production Department <transcripts@planetdepos.com>
Sent: Friday, December 27, 2024 4:17 PM
To: Don Bennion
Subject: Deppoleto -v- Takeover Industries Incorporated, et al.; Tom Zarro, Volume 2 - 12/13/2024
Attachments: Zarro, Tom 121324 Errata Sheet.pdf

Caution: External (transcripts@planetdepos.com)

Sensitive Content [Details](#)

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Dear Counsel,

The transcript in the above-referenced matter has been finalized and is ready for distribution.

The price of the electronic deposition transcript and exhibits (if applicable) *only* is **\$360.00**. This does not include the cost for any services utilized during the deposition, such as Realtime feeds. An additional fee is added for printing and shipping if you request a hard copy of the transcript.

Please visit <https://planetdepos.com/invoice-payment-form> to make your payment (**3% convenience fee applies**). Enter the Job Number **564880** within the "Invoice No." field.

Upon receipt of payment in the full amount, we will email you the transcript files.

It is our understanding that you have agreed to arrange for the reading and signing. Attached is the errata sheet.

Referenced Job Number: 564880

Thank you,

Cate Neuhauser | Planet Depos
Transcript Production Specialist
t 888.433.3767
clientservices@planetdepos.com
planetdepos.com



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Planet Depos
We Make It Happen™

Don Bennion, Jr., Esquire
Law Office of S. Don Bennion
6980 Oâ€™Bannon Drive Suite 400
Las Vegas, NV 89117

Re: Deposition of **Tom Zarro, Volume 2**

Date: 12/13/2024

Case: Deppoleto -v- Takeover Industries Incorporated, et al.

Dear Sir/Madam,

Attached please find the above-referenced deposition transcript. If applicable, signature is required within 30 days from the date of receipt of this letter.

In accordance with the disposition of signature at the deposition or the pertinent jurisdictional rules, the deponent should follow these instructions to complete the Errata Sheet:

- (1) Read the transcript and indicate any corrections or changes in ink on the enclosed Errata Sheet. Please include page and line numbers. If more space is needed for corrections, please use a blank sheet of paper. If no corrections or changes are necessary, please indicate "no corrections" or "no changes" on the Errata Sheet.
- (2) Sign and date the Errata Sheet and Acknowledgement of Deponent/Affiant pages.
- (3) Please return the executed Errata Sheet and Acknowledgement pages to the address indicated below, submit via fax (888-503-3767) or email (transcripts@planetdepos.com).

A copy of this letter and the returned signature pages, if any, will be distributed to counsel.

Sincerely,

Production Department
Planet Depos, LLC
451 Hungerford Drive
Suite 400
Rockville, Maryland 20850

No. 564880

(Signature)

(Signature)

No. 564880

Re: Deposition of **Tom Zarro, Volume 2**

Date: 12/13/2024

Case: Deppoleto -v- Takeover Industries Incorporated, et al.

Return to: transcripts@planetdepos.com

ACKNOWLEDGMENT OF DEPONENT

I, Tom Zarro, Volume 2, do hereby
acknowledge that I have read and examined the
foregoing testimony, and the same is a true, correct
and complete transcription of the testimony given by
me and any corrections appear on the attached Errata
sheet signed by me.

(Date)

(Signature)

Don Bennion

From: Planet Depos Production Department <transcripts@planetdepos.com>
Sent: Friday, December 27, 2024 4:17 PM
To: Don Bennion
Subject: Deppoleto -v- Takeover Industries Incorporated, et al.; Tom Zarro, Volume 2 - 12/13/2024
Attachments: Zarro, Tom 121324 Errata Sheet.pdf

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Referenced Job Number: 564880

Thank you,

Cate Neuhauser | Planet Depos
Transcript Production Specialist
t 888.433.3767
clientservices@planetdepos.com
planetdepos.com



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Don Bennion

From: Don Bennion
Sent: Monday, December 30, 2024 8:46 PM
To: Planet Depos Accounts Receivable Department; Planet Depos Client Services
Subject: RE: Deppoletto -v- Takeover Industries Incorporated, et al.; Mike Holley corporate representative deposition transcript
Attachments: 20241230203851036.pdf

Rahela,

As requested, attached are copies of the check in the amount of \$938.95 (check #1928) sent to Planet Depos via US Mail December 10 payable for the transcript of the deposition of Michael Holley, corporate representative, taken in November 2024, and the emails to and from Planet Depos and my office regarding Mr. Holley's deposition. Apparently, Planet Depos initially sent the invoice for this deposition referring to "job number 561276" and then the job number was changed to "559922" for reference on the invoice for this deposition. Perhaps this is part of the confusion. While I did reference a check sent to Planet Depos in the amount of \$960, the correct amount as set forth above is \$938.95. We trust you have received this check by now.

Please advise if you have any questions. Thank you.

S. Don Bennion
Attorney & Counselor at Law
Law Office of S. Don Bennion
6980 O'Bannon Drive Suite 400
Las Vegas, Nevada 89117
702.333.0777
702.333.0577f
don@bennionlaw.com

From: Planet Depos Accounts Receivable Department <ar@planetdepos.com>
Sent: Monday, December 30, 2024 5:37 AM
To: Don Bennion <don@bennionlaw.com>; Planet Depos Client Services <ClientServices@planetdepos.com>
Subject: Re: Deppoletto -v- Takeover Industries Incorporated, et al.; Tom Zarro, Volume 2 - 12/13/2024

Caution: External (ar@planetdepos.com)

First-Time Sender [Details](#)

[Report This Email](#) [FAQ](#) [GoDaddy Advanced Email Security](#), Powered by INKY

Good morning,

Thanks for your e-mail. Could you please provide a check number and you advised the exact amount is \$960.00?

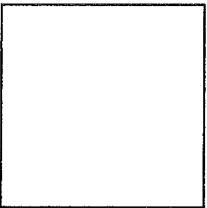
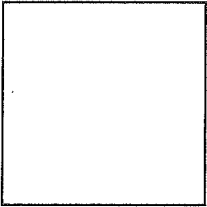
As of this morning, we don't show anything that came in for \$960.00. The delay could be due to the holidays.

As a one time professional courtesy, my client service team will release the transcript prior to our office receiving the payment.

Someone will get back to you shortly.

Best,
Rahela

Rahela Islam | Planet Depos
Accounts Receivable Manager
t 888.433.3767
ar@planetdepos.com
planetdepos.com



On December 27, 2024 at 7:44 PM EST clientservices@planetdepos.com wrote:

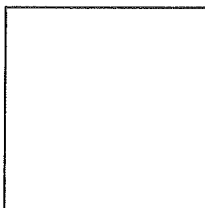
Good evening, Counsel,

Thank you so much for bringing this to our attention. I have looped in our billing team to check on the payment that was sent. Please allow them a moment to check for you.

Job: 559922

Warm regards,

Connie Rowell | Planet Depos
Client Services Specialist
t 888.433.3767
clientservices@planetdepos.com
planetdepos.com



On December 27, 2024 at 7:35 PM EST don@bennionlaw.com wrote:

[EXTERNAL]

Dear Planet Depos,

Thank you for this information regarding the deposition of Tom Zarro. We will submit payment for Mr. Zarro's electronic deposition transcript.

We previously requested copies of the deposition transcript of Michael Holley taken in November 2024. However, to date we have not received a copy of the deposition transcript of Michael Holley in electronic format or otherwise. My office sent you/Planet Depos a check in the amount of \$960 as required to receive a copy of Mr. Holley's deposition transcript more than three weeks ago but we have not yet received said deposition transcript. Please advise when we can expect to receive the deposition transcript of Mr. Holley's deposition taken in November 2024. Thank you.

S. Don Bennion
Attorney & Counselor at Law
Law Office of S. Don Bennion
6980 O'Bannon Drive Suite 400
Las Vegas, Nevada 89117
702.333.0777
702.333.0577f
don@bennionlaw.com

From: Planet Depos Production Department <transcripts@planetdepos.com>

Sent: Friday, December 27, 2024 4:17 PM

To: Don Bennion <don@bennionlaw.com>

Subject: Deppoleto -v- Takeover Industries Incorporated, et al.; Tom Zarro, Volume 2 - 12/13/2024

Dear Counsel,

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Please visit <https://planetdepos.com/invoice-payment-form> to make your payment (3% convenience fee applies). Enter the Job Number **564880** within the "Invoice No." field.

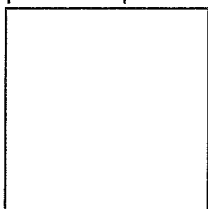
Upon receipt of payment in the full amount, we will email you the transcript files.

It is our understanding that you have agreed to arrange for the reading and signing. Attached is the errata sheet.

Referenced Job Number: 564880

Thank you,

Cate Neuhauser | Planet Depos
Transcript Production Specialist
t 888.433.3767
clientservices@planetdepos.com
planetdepos.com



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jennifer bennion

From: Don Bennion
Sent: Tuesday, December 10, 2024 6:27 PM
To: Planet Depos Production Department
Cc: jennifer bennion
Subject: RE: Deppoleto -v- Takeover Industries Incorporated, et al.; Mike Holley, Corporate Representative - 11/19/2024

Ms. Innello,

In order to eliminate the 3% convenience fee, please provide us with your mailing address so we can mail Planet Depos a check to pay for the deposition transcript of Mike Holley, corporate representative in the amount of \$938.95. Thank you.

S. Don Bennion
Attorney & Counselor at Law
Law Office of S. Don Bennion
6980 O'Bannon Drive Suite 400
Las Vegas, Nevada 89117
702.333.0777
702.333.0577f
don@bennionlaw.com

From: Planet Depos Production Department <transcripts@planetdepos.com>
Sent: Thursday, December 5, 2024 9:21 PM
To: Don Bennion <don@bennionlaw.com>
Subject: Re: Deppoleto -v- Takeover Industries Incorporated, et al.; Mike Holley, Corporate Representative - 11/19/2024

Dear Counsel,

Please disregard the job number in my previous email, as it was sent in error. Below, is how it was intended to read.

The price of the electronic deposition transcript with the exhibits attached for the deposition of Mike Holley, Corporate Representative is \$938.95. An additional fee is added for printing and shipping if you request a hard copy of the transcript.

Please visit <https://planetdepos.com/invoice-payment-form> to make your payment (3% convenience fee applies). Enter the Job Number 559922 within the "Invoice No." field.

Upon receipt of payment in the full amount, we will email you the transcript files.

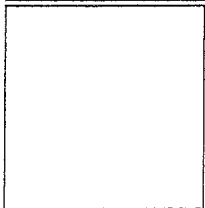
Referenced Job Number: 559922

Monica Innello | Planet Depos
Operations Specialist

t 888.433.3767

monica.innello@planetdepos.com

planetdepos.com



On December 6, 2024 at 12:14 AM EST transcripts@planetdepos.com wrote:

Dear Counsel,

The price of the electronic deposition transcript with the exhibits attached is \$938.95. An additional fee is added for printing and shipping if you request a hard copy of the transcript.

Please visit <https://planetdepos.com/invoice-payment-form> to make your payment (3% convenience fee applies). Enter the Job Number 561276 within the "Invoice No." field.

Upon receipt of payment in the full amount, we will email you the transcript files.

Referenced Job Number: 561276

Thank you,

Monica Innello | Planet Depos

Operations Specialist

t 888.433.3767

monica.innello@planetdepos.com

planetdepos.com

On December 5, 2024 at 11:40 PM EST don@bennionlaw.com wrote:

[EXTERNAL]

Yes, please provide us with the cost to purchase the deposition transcript. I request you provide a copy of the above-referenced deposition transcript. The video recording of the deposition is not requested. Thank you.

S. Don Bennion
Attorney & Counselor at Law
Law Office of S. Don Bennion
6980 O'Bannon Drive Suite 400
Las Vegas, Nevada 89117
702.333.0777
702.333.0577f

jennifer bennion

From: Don Bennion
Sent: Tuesday, December 10, 2024 6:35 PM
To: Planet Depos Client Services
Cc: jennifer bennion
Subject: RE: Deppoleto -v- Takeover Industries Incorporated, et al.; Mike Holley, Corporate Representative - 11/19/2024

Thank you.

S. Don Bennion
Attorney & Counselor at Law
Law Office of S. Don Bennion
6980 O'Bannon Drive Suite 400
Las Vegas, Nevada 89117
702.333.0777
702.333.0577f
don@bennionlaw.com

From: Planet Depos Client Services <ClientServices@planetdepos.com>
Sent: Tuesday, December 10, 2024 6:30 PM
To: Don Bennion <don@bennionlaw.com>
Cc: jennifer bennion <jen@bennionlaw.com>
Subject: Re: Deppoleto -v- Takeover Industries Incorporated, et al.; Mike Holley, Corporate Representative - 11/19/2024

Dear Counsel,

Thank you for your email. If you would like to avoid the 3% convenience fee, you may send a check to us at:

P.O. Box (our remittance address)

*****DO NOT FEDEX TO P.O.BOX. CHECKS SENT VIA FEDEX TO P.O.BOX. WILL NOT BE PROCESSED*****

PLANET DEPOS, LLC
P.O.BOX 791571
Baltimore, MD 21279-1571

Or, for a Wire/ACH payment option, please contact ar@planetdepos.com.

***Please note that service is only rendered when the payment is successfully received and processed by our office. Mail may take up to 3 weeks to be received.*

Job Reference Number: 561276

Thank you,

Sam Kirby | Planet Depos

Law Office of S. Don Bennion
6980 O'Bannon Drive #400
Las Vegas, NV 89117

1928

94-177/1224

DATE Dec 10, 2024

PAY
TO THE
ORDER OF

Planet Depos LLC

938.95
XX

Nine Hundred and thirty eight dollars + 95/100

DOLLARS

Bank of Nevada

Job #559922 or 561276

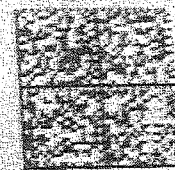
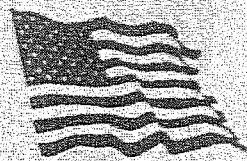


NOT NEGOTIABLE

⑈001928⑈ ⑈122401778⑈

Law Office of S. Don Bennion

6980 O'Bannon Drive #400
Las Vegas, Nevada 89117



Quotient
FIRST CLASS MAIL
M
\$000.97
ZIP CODE 21279-1571

Planet Depos, LLC
P.O. Box 791571
Baltimore, MD 21279-1571